

1
2
3
4
5
6
7
8 **UNITED STATES DISTRICT COURT**

9 **NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO**

10 JEREMY STANFIELD, on behalf of himself and all
11 others similarly situated,

12 Plaintiff,

13 v.

14 TAWKIFY, INC., and DOES 1-25,

15 Defendants.

Case No. 3:20-cv-07000-WHA

**CORRECTED [PROPOSED] ORDER
GRANTING TAWKIFY, INC.'S
ADMINISTRATIVE MOTION TO FILE
UNDER SEAL RE: SUPPLEMENTAL
BRIEFING RE: CONVERTED
MOTION FOR SUMMARY
JUDGMENT**

**[PURSUANT TO CIVIL L.R. 7-11 AND
79-5(d)]**

16
17
18
19 Assigned to Hon. William H. Alsup

The Court, having considered Defendant Tawkify, Inc.'s Administrative Motion to File Under Seal and the Declarations of Thane Schultz and Jahmy S. Graham in support thereof, as well as all other supporting and opposing arguments and papers, and finding good cause and/or compelling reasons, HEREBY ORDERS:

1. Defendant Tawkify, Inc.'s Administrative Motion to File Under Seal is **GRANTED**.
2. The following documents or portions of documents are sealed:

Exhibit	Document	Portions to Be Sealed
1	Supplemental MSJ Briefing	Highlighted redactions at <ul style="list-style-type: none"> • p. 3, lines 3-8 • p. 5, lines 1-2 • p. 6, lines 6-9, 21 • p. 10, lines 6, 8-9 • p. 12, line 8
2	Schultz Declaration, Ex. B (Tawkify notes from call with Plaintiff, TAWKIFY_STANFIELD_00099)	Entire document
3	Schultz Declaration, Ex. C (Text messages between parties, TAWKIFY_STANFIELD_00179 - 185)	Entire document
4	Schultz Declaration, Ex. D (Date feedback, TAWKIFY_STANFIELD_00202-204)	Entire document
5	Schultz Declaration, Ex. E (7/18/2020 offer for non-refundable bonus, TAWKIFY_STANFIELD_000003)	Entire document
6	Schultz Declaration, Ex. F (Internal notes re: calculation of refund, TAWKIFY_STANFIELD 00115-116)	Entire Document
7	Schultz Declaration, Ex. G (Account activity log regarding Plaintiff, TAWKIFY_STANFIELD_00205-210)	Entire document

Exhibit	Document	Portions to Be Sealed
8	Graham Declaration, Ex. A (Transcript of Plaintiff's Call)	Entire document
9	Graham Declaration, Ex. B (Emails between parties, STANFIELD000030)	Highlighted redactions
10	Graham Declaration, Ex. D (7/19 email, STANFIELD000085-87)	Highlighted redactions
11	Graham Declaration, Ex. E & F (Text messages, STANFIELD000099) (Email receipt, STANFIELD000005)	Highlighted redactions
12	Graham Declaration, Ex. G (Email following purchase, STANFIELD000008-10)	Highlighted redactions
13	Graham Declaration, Ex. I (Text messages, STANFIELD113-116)	Highlighted redactions
14	Graham Declaration, Ex. K (Text messages before date, STANFIELD000130)	Highlighted redactions
15	Graham Declaration, Ex. L (Emails between parties, STANFIELD000016-17)	Highlighted redactions
16	Graham Declaration, Ex. M (Emails between parties, STANFIELD000013-14)	Highlighted redactions

Exhibit	Document	Portions to Be Sealed
17	Graham Declaration, Ex. N (Emails regarding first date, STANFIELD000038)	Highlighted redactions
18	Graham Declaration, Ex. O (Text messages, STANFIELD000134-35)	Highlighted redactions
19	Graham Declaration, Ex. Q (Emails between parties, STANFIELD000050-53)	Highlighted redactions
20	Graham Declaration, Ex. R (Bank records, STANFIELD000146)	Highlighted redactions
21	Graham Declaration, Ex. S (Email between parties, STANFIELD000044)	Highlighted redactions
22	Graham Declaration, Ex. T (Emails between parties, STANFIELD000040-42)	Highlighted redactions
23	Graham Declaration, Ex. U (Bank records, STANFIELD000148)	Highlighted redactions
24	Graham Declaration, Ex. W (Emails between parties, STANFIELD000039)	Highlighted redactions
25	Graham Declaration, Ex. X (Emails between parties, STANFIELD000135-136)	Highlighted redactions

Exhibit	Document	Portions to Be Sealed
26	Graham Declaration, Ex. Y (Emails between parties, STANFIELD000082-84)	Highlighted redactions
27	Graham Declaration, Ex. Z Deposition of Plaintiff Jeremy Stanfield	Highlighted redactions
28	Graham Declaration, Exh AA Deposition of Thane Schultz	Highlighted redactions

Dated: _____, 2021

Hon. William H. Alsup
UNITED STATES DISTRICT JUDGE